



**HELEN F. DALTON & ASSOCIATES, P.C.**  
*ATTORNEYS AT LAW*

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June 28, 2022

**Via ECF:**

The Honorable John P. Cronan, U.S.D.J.  
United States District Judge  
Southern District Of New York  
Daniel Patrick Moynihan U.S. Courthouse  
500 Pearl Street, Courtroom 12D  
New York, New York 10007  
[CronanNYSDChambers@nysd.uscourts.gov](mailto:CronanNYSDChambers@nysd.uscourts.gov)

Re: **Santos Guzman Garcia, et al. v. Moncon, Inc., et al.**  
Docket No. 1:20-cv-5024 (JPC)

Dear Judge Cronan:

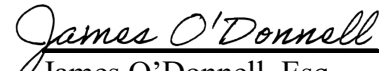
This office represents Plaintiffs in the above referenced matter (“Plaintiffs”) and we submit this letter motion jointly with Defendants to respectfully request that pre-trial submission date of July 1, 2022 and the jury trial start date of October 22, 2022 be adjourned *sine die*. The reason for this request is that the parties have reached a settlement-in-principle to resolve all remaining claims asserted in this action.

Early today, the parties agreed on the terms of a settlement and will now begin drafting the necessary settlement documents. As this matter involves claims asserted under the Fair Labor Standards Act, the parties will be preparing the settlement agreement and motion for settlement approval for the Court’s review pursuant to *Cheeks v. Freeport Pancake House*, 796 F.3d 199 (2d. Cir. 2015). As such, we ask that the above dates be adjourned so that the parties may focus their efforts on preparing these documents.

If this request is granted, the parties respectfully request an August 1, 2022 deadline for submitting the settlement documents to the Court.

This is the fifth request for an adjournment of the pre-trial submission date, however, this is the first such request due to the parties reaching a settlement-in-principle. This request will not affect any other deadlines than those stated above. We thank the Court for its patience and continued consideration.

Respectfully submitted,

  
James O'Donnell, Esq.


The parties' request is granted. The parties shall submit any settlement requiring Court approval under *Cheeks v. Freeport Pancake House*, 796 F.3d 199 (2d Cir. 2015), and any other necessary information, by August 1, 2022. All deadlines and conferences in this action, including the July 1, 2022 deadline for the parties to submit their proposed joint pretrial order and any motions *in limine*, is adjourned *sine die*.

CC: via ECF

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*ATTORNEY TO BE NOTICED*

SO ORDERED.

Date: June 29, 2022  
New York, New York

  
JOHN P. CRONAN  
United States District Judge

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*ATTORNEY TO BE NOTICED*